

COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department of  
Telecommunications and Energy on its own Motion  
into the Appropriate Pricing, based upon Total  
Element Long-Run Incremental Costs, for  
Unbundled Network Elements and Combinations of  
Unbundled Network Elements, and the Appropriate  
Avoided Cost Discount for Verizon New England,  
Inc. d/b/a Verizon Massachusetts' Resale Services  
in the Commonwealth of Massachusetts

D.T.E. 01-20

**AT&T's SEVENTEENTH SET OF INFORMATION  
REQUESTS TO VERIZON**

AT&T Communications of New England, Inc. hereby submits the following information  
requests to Verizon. Please provide responses to these requests as they are completed.

Instructions

Each request should be answered on a separate page preceded by the request and by the name  
of the person responsible for the answer.

Please provide answers as they are completed.

These requests shall be deemed continuing so as to require supplemental responses if Verizon  
subsequently receives or becomes aware of additional information responsive to these  
requests.

If an answer refers to Verizon's response to another information request in this proceeding,  
please provide that response with the answer.

If Verizon cannot answer a request in full, answer to the extent possible and state why Verizon  
cannot answer the request in full.

If Verizon refuses to respond to any request by reason of a claim of privilege, state the privilege  
claimed and the facts relied upon to support the claim of privilege.

Unless otherwise stated, these requests concern Verizon's Massachusetts intrastate operations.

The page references in the following questions are to the hard copy of the Direct Testimony of

Louis D. Minion on behalf of Verizon Massachusetts on Costs and Rates For Access to OSS ("Minion Direct") and accompanying Exhibit and Workpapers distributed by Verizon on May 8, 2001.

INFORMATION REQUESTS

- ATT-VZ 17-1. Please define and explain the purpose of the following systems ("Systems") listed as part of the one-time development expense in Workpaper 4 Page 1.
- (a) Gateway;
  - (b) Core Network Sys; and
  - (c) Operator Services.
- ATT-VZ 17-2. For each of the Systems, identify each of the specific expenses making up the total amount (Column D) for each of lines 1, 2, 4, 5, 5a, 7, 8, 10 and 11, and for each such expense, identify the equipment purchased or activities undertaken which comprise the expense, including identification of particular software and/or hardware, and explain in detail the function served by each such piece of equipment or such activity.

Respectfully submitted,  
AT&T COMMUNICATIONS OF  
NEW ENGLAND, INC.  
By its attorneys,

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